

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MIODRAG BELJAKOVIC,

Plaintiff,

- against -

MELOHN PROPERTIES, INC.,

Defendant.

04 Civ. 3694 (RJH) (GWG)

**DEFENDANT'S
NOTICE OF MOTION
IN LIMINE AND
OBJECTIONS TO EXHIBITS**

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PLEASE TAKE NOTICE, that, upon the annexed Affirmation of William Hummell, Esq., In Support of Defendant's Motion *In Limine* and Objections to Exhibits, dated November 12, 2007, including the exhibits annexed thereto, and upon the accompanying Brief in Support, dated November 12, 2007, defendant Melohn Properties, Inc. ("MPI"), by and through its attorneys, Kucker & Bruh, LLP, will move this honorable Court, as provided in paragraph 3 of the Court's Amended Trial Order dated September 26, 2007 (the "9-26-07 Order"), before the Hon. Richard J. Holwell, United States District Judge, at the Courthouse located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 17B, New York, New York, for an order of preclusion in limine of proposed trial evidence and testimony suggested by plaintiff Miodrag Beljakovic ("Beljakovic").

Defendant MPI's motion in limine and objections to exhibits shall be heard on a date to be determined by Judge Holwell, or shall be determined without a hearing as His Honor shall subsequently determine based on the 9-26-07 Order and the parties' respective papers.

PLEASE TAKE FURTHER NOTICE, that, pursuant to paragraph 3 of the 9-26-07 Order, answering papers, if any, must be served by Plaintiff Beljakovic on the undersigned attorneys for defendant MPI, and delivered to Chambers of Judge Holwell no later than November 19, 2007, unless Plaintiff obtains additional time by contacting Chambers (fax number: (212) 805-7948).

Dated: New York, New York
November 12, 2007

KUCKER & BRUH, LLP
Attorneys for Defendant
Melohn Properties, Inc.

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By:



William D. Huhmell, Esq.
(WH-7071)